



# All-Party Parliamentary Group on Sport, Modern Slavery and Human Rights

Interim Report, July 2019



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# Executive Summary

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This is the first report of the All Party Parliamentary Group on Sport, Modern Slavery and Human Rights (the APPG). Parliamentarians came together based on the reality that sport is a major industry and part of the British brand at home and overseas. At its best, sport is a celebration of human excellence based on respect, equality and fair play, but sport can also be a domain for exploitation, discrimination and intimidation. At its heart lies the “autonomy of sport” - a concept that aims to keep sport from political interference but which can also pose questions about a lack of accountability and undeclared conflicts of interest. The APPG is working to listen to a wide range of stakeholders involved in UK sport, at home and abroad, about how respect for human rights can be best integrated at all levels. It has focused on: the human rights impacts of the mega-sporting events (MSEs) lifecycle, the impacts of human rights legislation such as the UK Modern Slavery Act (MSA) on companies operating around sport, and discrimination in sport.

It is clear already that the human rights issues are complex and varied. Child Protection is an immediate concern – adult survivors in sports such as football, swimming and gymnastics are increasingly speaking out about the abuse faced at the hands of coaches and the impunity of those in positions of power over children. Several female athletes have shared experiences of the vast gender pay gap in most sports and the barriers many girls and women face from school onwards. Racism and other forms of discrimination continue to persist across the sporting industry, both on the field and in the boardrooms.

The APPG has also taken a particular interest in MSEs, hearing from those companies, trade unions and NGOs involved in events such as the 2018 FIFA World Cup in Russia, Tokyo 2020 and Qatar 2022. The conditions facing migrant workers in construction are a particular concern and the APPG has seen the value of human rights due diligence under frameworks such as the United Nations Guiding Principles on Business and Human Rights. The APPG also heard from journalists who cover some of these events as well as a number of media companies about their responsibilities as broadcasters.

This report shares some initial findings from the APPG for the UK Government and legislators. These findings are based on the evidence received in the first half of the APPG and are therefore subject to change and review. These findings, in addition to others based on further evidence, will form the basis for recommendations that the APPG will make next year.





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# Introduction

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# 1

## 1.1 Purpose of the APPG

The All-Party Parliamentary Group on Sport, Modern Slavery and Human Rights (the APPG) was established in March 2018 with the view to finding solutions to pressing human rights problems affecting large scale sporting events around the world. The group has focused on three specific areas:

1. the human rights impacts of the mega-sporting events (MSE) lifecycle;
2. the impacts of the UK Modern Slavery Act (MSA) on corporates operating in sport;
3. discrimination in sport in all its forms.

The APPG is chaired by Alex Norris MP and Baroness Young of Hornsey; the vice Chair is Lord Moynihan and the Secretariat is provided by the UN Global Compact Network UK with expert input from the Institute for Human Rights and Business (IHRB).

## 1.2 The UN Guiding Principles on Business and Human Rights

The UN Guiding Principles on Business and Human Rights (UNGPs) are the authoritative framework for discussions around business and human rights and are relevant in that sport organisations act with business interests. Governments must take responsibility as it is at that level that bids to host major events are made.

The **UNGPs** are structured as three pillars:

- 1. The State duty to protect human rights:** States have a responsibility to set legal and regulatory requirements to prevent corporate human rights abuses from happening, whilst also developing legislation that means all human rights can be fulfilled. It is further the responsibility of government to ensure that these policies are applied consistently.
- 2. The corporate responsibility to respect human rights:** Businesses have a responsibility to ensure that their practices do not negatively impact people. This means they must exercise human rights due diligence to prevent and mitigate human rights abuses, and should use their leverage to influence the behaviour of others.
- 3. Ensuring effective access to remedy:** Both States and businesses have a responsibility to ensure that where their operations negatively impact people, they offer mechanisms to fix the issue, or provide alternatives where this is not possible.

The UK Government has taken positive steps in fulfilling its duty to protect human rights by being the first country to develop a national action plan on business and human rights (NAP) (first published in September 2013 and subsequently updated in May 2016). The NAP calls for coherence between all government departments in the human rights requirements that are made of business and commercial enterprises, including the government's own economic activities through public procurement, export credit and trade relations.

## 1.3 Modern Slavery

The International Labour Organization (ILO) [estimates](#) there to be around 40 million modern day slaves in the world – the victims of human trafficking, forced labour and forced marriages. It is a truly global problem, with no complex supply chain immune from the risk: including in the world of sport. The UK was one of the first jurisdictions to introduce modern slavery legislation which includes a focus on global supply chains (2015 Modern Slavery Act). All commercial entities (including some non-profit companies such as charities) - operating at least in part in the UK with a global annual turnover of £36 million or more - are required to produce annual modern slavery statements that must be signed off at board level. Many of the larger UK sports organisations have been required to do so, as well as many of their larger suppliers. Since late 2018, the Prime Minister has made a number of commitments regarding transparency in supply chains including a review of the workings of the Act. Given these announcements, it is increasingly likely that future major sporting events in the UK will need to comply fully with the Modern Slavery Act.

The UK has also committed to continuing to work on business and human rights and to helping other countries in doing the same. It has also made commitments to fulfilling the UN Sustainable Development Goals, which include metrics on healthy, active communities, gender equality, decent wages and economic growth among others. These commitments are relevant, particularly when considering the UK's hosting of international events such as the 2022 Commonwealth Games in Birmingham, which will provide all levels of government an opportunity to showcase what best practice looks like in the hosting of an MSE.

## 1.4 Purpose of the Interim Report

The purpose of this interim report is to highlight some of the areas that have been examined by the APPG thus far, and to solicit additional evidence for consideration over the course of the next 12 months.

All readers are welcome to provide additional information they feel is relevant to the topics covered in this report, and can also provide answers to the call for evidence – questions for which can be found online [here](#).

The salient issues considered during the first year (April 2018 – March 2019) are:



- Workers in the construction of mega-sporting events
- Due diligence in sports supply chains
- The responsibilities of Local Organising Committees
- Sports broadcasting and the media
- Discrimination in sport

## 1.5 Background

Under the first focus area, the APPG first took evidence on the **rights of workers in the construction of Mega-Sporting Events (MSEs)**. This session highlighted some of the appalling practices at sporting events to date with deaths reported at nearly every major sporting event over the past decade. It highlighted issues including health and safety, decent working and living conditions, decent and timely wages, right to freedom of association and collective bargaining, and trafficking and forced labour. The APPG also received evidence on **due diligence in sports supply chains** highlighting similar risks to the supply chains of other sectors such as textiles, agriculture and ICT, and suggesting that sport look to its peers in other sectors for best practice on how to mitigate many of these risks. The final topic in this focus area looked at the **responsibilities of local organising committees (LOCs)** including the different phases of the MSE lifecycle. It was recommended that the UK government consider incentives to encourage UK-based sports bodies to integrate human rights into bidding requirements so risks are considered from the outset. This is an approach that has already been taken by sports bodies such as the IOC, FIFA and UEFA.

The second focus area considered the implications relating to **broadcasting and the media**. Risks in this sector range from protecting fans and others from discrimination, maintaining the right to privacy, and ensuring freedom of the press. A key outcome of that session was the identification of the prevalence of social media as a pseudo broadcaster and the need for regulation to catch up.

The final focus area considered some aspects of discrimination in sport. This session looked first at **gender discrimination** which is often viewed through the lens of remuneration; however, evidence heard by this APPG made clear that inequalities remain in access to sporting opportunities, equality of resources and equal representation on Boards of sporting federations. As with questions around the supply chain, the sporting sector finds itself behind other sectors, but can learn from these industries to close the gap. The final area considered under discrimination looked at **racial discrimination**. While data-gathering by gender is still rare, data across BAME and disability is virtually non-existent, meaning in many cases, organisations do not even have a sense of the extent to which minorities are being excluded from opportunities.

This APPG is halfway through its evidence gathering. This report is therefore an indication of the themes that have been discussed. The aim for the second half will be to revise, strengthen and add to this report. Readers of this paper are therefore encouraged to add to that which is already in this report, and to send further evidence to the group through the questions online [here](#).

## 1.6 Overview of Interim Findings

Over the year ahead and based on existing evidence, the APPG will look towards including appropriate recommendations in the following areas:

- Companies working on the construction of sports venues and in the supply chains of major events to report under the 2015 Modern Slavery Act;
- In relation to the supply chains of public authorities as well as private companies, the UK Government's full implementation of the recommendations of the Independent Review of the Modern Slavery Act which reported to Parliament in May 2019;
- Ensuring adequate child safeguarding for every event hosted in the UK, particularly for youth events;
- Encouraging sports bodies to consider human rights from the outset and integrate them into bid requirements;
- When hosting an event, supporting the Local Organising Committee by allocating budget and resource to facilitate human rights due diligence processes;
- Strengthening the Ofcom Broadcasting Code to consider social media outlets as broadcasters, particularly in cases of live streaming sport;
- Public authorities to start quantifying who is using what when it comes to public spaces and logging this information in a central database – for example, are boys teams using communal football pitches significantly more than girls teams;
- Considering enacting legislation similar to Title IX in the United States which views sport as an educational opportunity for girls and key to their future career success;
- Reviewing the reporting of gender in sport to include other diversity metrics in recognition of the intersectionality of several forms of discrimination.







# Workers in the Construction Industry and Mega-Sporting Events

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# 2

## 2.1 Summary

One of the biggest human rights risks in commercial relationships surrounding sport, particularly regarding MSEs, relates to the construction of venues. When looking at the worst violations of workers rights in the construction of stadiums at MSEs, this can mean fatalities – 50 people died in construction activity for the 2010 Commonwealth Games in New Delhi, 9 people ahead of the 2014 FIFA World Cup in Brazil, 21 for the 2018 Russia World Cup, 2 so far for the Tokyo 2020 Olympics, and a wide range of estimates for Qatar 2022, from a few dozen to a few thousand when estimates include non-World Cup projects. London 2012 is the only major IOC or FIFA event in recent years to have zero fatalities.

## 2.2 Key Issues

1. Health and safety risks – Construction work can be particularly dangerous if a number of due diligence steps are not in place, such as working at height without adequate safety equipment, being properly trained or the absence of sufficient breaks. Sub-contracting exacerbates these risks because there is less oversight and often less accountability.
2. Decent working and living conditions – There are several cases of workers being crammed into one room with limited access to hygiene facilities and running water, as well as workers found to be working excessive hours without rest days.
3. Decent and timely wages – There have been cases of workers not being paid on time or being paid an amount less than what was promised. Workers are made more vulnerable by not having contracts in many cases.
4. Right to freedom of association and collective bargaining – A lack of effective representation affects workers' abilities to raise concerns and to work with employers to improve conditions.
5. Trafficking and forced labour – Several factors make migrant workers more vulnerable to modern slavery including the recruitment process, recruitment fees, vulnerable visa status in the host country and retention of personal documents such as passports.

## 2.3 Relevance of the Modern Slavery Act

The UK Modern Slavery Act is particularly relevant in a number of ways:

- Major sporting events hosted in the UK are themselves exercises in public procurement and/or involve significant commercial entities so as to be captured by the reporting requirement of the Act. Therefore events such as Birmingham 2022 should be emblematic of what good practice looks like.
- In some sports, the teams are themselves large commercial entities. For example, all Premier League football teams are captured by Section 54 of the Act and so again, all major football events should represent best practice in terms of supply chain due diligence and disclosure.
- Large UK-based sponsors and broadcasters are already reporting under the Act and so should be considering how best they can use their collective leverage to identify human rights and modern slavery risks associated with sporting events overseas and to prevent or minimise the risks of human rights violations occurring.

### *Case Study: Qatar 2022*

Researchers on the ground in Qatar have documented workers living in squalid conditions, paying recruitment fees, not receiving wages on time, and having their passports confiscated among other issues.

There has however been improvement. Labour reforms have been introduced, and the Supreme Committee has developed a set of Worker Welfare Standards. This framework is setup to ensure that the stadiums and infrastructure directly related to the World Cup are built in a manner that protects and safeguards the rights of workers. However, concerns still exist including the fact that the Standards cover only those workers engaged on World Cup projects, meaning those working on additional infrastructure such as transport, hotels, or other construction being built ahead of 2022 are not covered.

The following progress was noted:

- Impactt and Qatar 2022's Supreme Committee for Delivery and Legacy have together developed a "Universal Payment" model which seeks to provide a remedy for those workers who have paid recruitment fees in their countries of origin.
- The Supreme Committee began piloting this model in January 2018 with impressive results: as at the end of May 2018, over 30 contractors from all tiers of the construction supply chain have committed to return £6.23 million to more than 6,000 workers.
- The model is being verified on a quarterly basis to confirm that payments are reaching workers.

## 2.4 Interim Findings

When hosting an event or providing services:

- Companies employing workers through recruitment agencies should be required to prove that their employees have not had to pay recruitment fees thereby reversing the burden of proof and making workers less vulnerable.
- All UK companies working on the construction of public spaces, such as sports stadia, should undertake human rights due diligence in line with the UN Guiding Principles on Business and Human Rights, the OECD Guidelines on Multi-national Enterprises and other international standards.
- Government should consider ways of extending, or better enforcing, the Modern Slavery Act, including by considering how best to use the world of sport to better convey the key messages to the wider public and business community.

For more detailed information on this topic, please see the session summary, available online [here](#).





# Due Diligence in Sports Supply Chains

# 3

## 3.1 Summary

Businesses are vulnerable to risks such as human rights abuses and/or modern slavery when they have distant and opaque supply chains. The chain from primary resources to finished product is often highly complex with a range of suppliers, geographies, materials and workers involved. This is the inherent problem in the production of any material product and sporting supply chains are no exception. The fact that the demand for many of the goods used in MSEs is coming from temporary organisations (ie. local organising committees) further exacerbates this risk in the sport context. Supply chain issues have long been associated with the Olympics, with [concerns of child labour](#) raised over the manufacture of mascot toys produced ahead of London 2012 for example.

## 3.2 UK Modern Slavery Act – Section 54: Transparency in Supply Chains

Section 54 of the Act requires commercial organisations in any sector with a global annual turnover of £36 million or more who do business in the UK to disclose the steps they are taking to address modern slavery in their business and supply chain through an annual Slavery and Human Trafficking Statement. It is estimated that there are around [15,000-20,000 companies](#) who are required to comply with the Act, and around 12,000 who have published statements.

## 3.3 Key Issues

The [human rights risks in the sports supply chain](#) are much the same as the human rights risks in any other supply chain and can include:

1. Health and safety – There have been well-documented cases of workers working in dangerous conditions, without adequate training or lacking safety equipment.
2. Decent working conditions – Also a cross-sector issue is supply chain workers who work excessive overtime hours and lack rest days.
3. Decent wages – Workers should be paid an adequate living wage and wages should be paid on time and in-full.

4. Forced labour – Similar to other sectors, migrant workers are particularly vulnerable to forced labour and human trafficking often through the deceitful practices of recruiters, paying recruitment fees, and being tied to their employers for visas.
5. Child labour – Child rights can be impacted if they work illegally including their right to health, right to education and to go to school, right to play, and their right to an adequate standard of living and adequate care.

## 3.4 Emerging Good Practice

### 1. The Netherlands: National Policy for Sustainable Procurement

- In 2005, clear goals for sustainable public procurement were established for the national and municipal governments as an aspect in government tenders.
- Since 1 January 2013, all tender contracts from the national government that exceed the European thresholds are required to include "Social Conditions".
- The Social Conditions are based on the basic ILO standards: freedom of association and the right to organise, the abolition of forced and child labour, the elimination of discrimination and respect for human rights.
- For the purchasing of coffee, work clothing, tea, cocoa and flowers, there are additional conditions related to living wages, working hours, safety, fair trade standards, minimum price and pre-financing.

### 2. Wales: Code of Practice – Ethical Employment in Supply Chains

- This Code of Practice was established by the Welsh Government to support the development of more ethical supply chains to deliver contracts for the Welsh public sector and third sector organisations in receipt of public funds.
- The Code covers the following employment issues: modern slavery and human rights abuses, blacklisting, false self-employment, unfair use of umbrella schemes and zero hours contracts, and paying the Living Wage.
- In signing up to the Code, organisations agree to comply with 12 commitments designed to eliminate modern slavery and support ethical employment practices.
- All public sector organisations, businesses and third sector organisations in receipt of public sector funding are expected to sign up to this Code.

## 3.5 Interim Findings

- All national and international sporting federations domiciled in the UK should ensure that the rights of children are central to their due diligence processes.
- Child safeguarding is a primary consideration for any event being hosted in the UK, particularly for youth events.
- The UK Government should implement in full the recommendations of the Independent Review of the MSA which reported to Parliament in May 2019. Of particular relevance are recommendations such as:

- having a central, government-run repository that companies are required to upload their statements to;
- government should take the necessary legislative steps to strengthen its approach to tackling non-compliance;
- extending Section 54 to the public sector.

For more detailed information on this topic, please see the session summary, available online [here](#).



# The Responsibilities of Local Organising Committees (LOCs)

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# 4

## 4.1 Summary

Research has linked MSEs and sport in general to negative human rights impacts, including abuse of child athletes and volunteers, child labour, and the forced relocation of families from their homes. If left unchecked, these negative impacts risk outweighing the positive benefits commonly attributed to MSEs such as increased employment and learning opportunities, regeneration of housing, urban areas, leisure and sport facilities.

Many sports bodies are constituted as private companies, and therefore have a responsibility under the UNGPs to respect human rights and avoid causing harm. Furthermore, local organising committees are often comprised of both private and public actors and therefore have a responsibility under the UNGPs to both protect and respect human rights.

## 4.2 The MSE Lifecycle

1. Vision, Concept and Legacy – Organisers should engage relevant stakeholders to identify key risks and develop mitigation plans from the outset.
2. Bidding, Planning and Design – Many sports bodies, including the IOC and FIFA, are now integrating human rights into their bidding requirements, which means potential issues need to be identified at this early stage to successfully win a bid .
3. Income Generation – Risks can be reputational for both the companies involved and the event organisers meaning that the sponsors and broadcasters providing significant funding will want to ensure that an event is not going to pose unnecessary risks to their business.
4. Sustainable Sourcing – Consumers are increasingly aware of the practices of sporting goods companies and their supply chains. Event organisers should therefore look to reduce supply chain risks through sustainable sourcing policies.
5. Construction – Potential human rights risks including: health and safety, wages being paid on time and in full, risks of trafficking and modern slavery etc.



6. Delivery and Operations – Risks here are heightened due to the impending start of the event and can include: Increased police presence, crackdown on free speech, increased risks of trafficking etc.
7. Competition – Risks at this stage often relate to the athletes and fans, and can include a “live incident” such as offensive chants from fans
8. Legacy – Events should benefit local communities whether by improving infrastructure, creating jobs, developing local economies etc. It is important that these benefit are actually realised.

### *Case Study: Commonwealth Games – Glasgow 2014*

Glasgow 2014 was the first local organising committee ever to publish a [human rights policy](#) and to report on its efforts. This included:

- paying a Living Wage to its UK-based workforce;
- contractually requiring factory disclosure by suppliers to facilitate effective monitoring and accountability of its supply chains;
- promoting child rights in Scotland and across the Commonwealth (reaching 11.7 million children through programmes supported by fundraising from the Games).

Publicity and audience reach surrounding MSEs can generate significant support and funds for rights and development-related projects at home and abroad.

## 4.3 Interim Findings

- Sports bodies can consider human rights from the outset and integrate them into bid requirements, in particular international sports bodies domiciled in the UK such as: The Commonwealth Games Federation, International Netball Federation, Rugby League International Federation, International Tennis Federation and World Sailing.
- Sports bodies and LOCs can be required and incentivised to proactively align their bidding, host contracts, planning and delivery with the UNGPs and communicate their efforts widely, as a credible means of mitigating risks.
- The need to better understand ways that all those working in sport receive adequate human and child rights guidance to support alignment with the United Nations Guiding Principles on Business and Human Rights and the UK Modern Slavery Act.
- When hosting an event, ways in which government can support the LOC by allocating budget and resource to facilitate human rights due diligence processes.

For more detailed information on this topic, please see the session summary, available online [here](#).



# Sports Broadcasting and the Media

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# 5

## 5.1 Summary

Broadcasting plays an important role in MSEs. It is the conduit by which a global audience accesses such events. Opinions differ on the role broadcasters should take when faced with broadcasting events that take place in challenging human rights contexts. Some argue that broadcasters should use this role to raise awareness of human rights issues in the host country, while others say that broadcasting the events is a tacit endorsement of a local government whose policies may have an adverse impact on local communities. This is a difficult balancing act. However, the key role for broadcasters is to bring sports events to viewers at home providing pure sports entertainment.

## 5.2 The Ofcom Broadcasting Code

The Ofcom Broadcasting Code outlines the rules by which television and radio programmes in the UK must abide. It is split into ten sections and covers issues including: protecting U-18s, harm and offence, impartiality, privacy and fairness among others. The Code also makes explicit reference to Articles 8, 9, 10 and 14 of the European Convention on Human Rights.

## 5.3 Broadcasting Models

There are various broadcasting models which determine the level of editorial control a broadcaster has over the material that goes to air. There are also various operating models for broadcasters – for instance, not all broadcasters have news programming where sensitive issues can be presented and discussed appropriately.

Types of sport broadcasting include:

- Host broadcaster: Where broadcasters have full editorial control.
- World feed with commentary: Where broadcasters take the full live programme from the host broadcaster including presentation and commentary.
- World feed without commentary: Where broadcasters receive the pictures and presentation from the host broadcaster, but provide their own commentary.
- Acquired & commissioned content: Where broadcasters either buy fully completed programmes, or commission original content (not necessarily applicable with MSEs).

## 5.4 Key Issues

Depending on which of the various broadcasting models is being used, the human rights issues that can be present include:

- Protection from discrimination – The ‘live’ nature of many events mean that broadcasters are responding in real-time to issues such as racial or homophobic chanting, protests outside the stadium, challenging political contexts etc.
- Right to privacy – This is particularly relevant in the context of social media where content can ‘go viral’ making it difficult to contain. Social media broadcasting also sits outside of the Ofcom Broadcasting Code.

For journalists covering stories, risks can include:

- Freedom of the press – There are several examples of reporters being denied entry into Russia ahead of the World Cup, being arbitrarily detained in China ahead of the 2008 Olympics, and crackdowns ahead of the F1 races in Bahrain.

## 5.5 Interim Findings

- Government should consider strengthening the Ofcom Broadcasting Code to include those social media outlets acting as broadcasters, particularly in cases where social media sites are being used for live streaming of sporting events. The APPG notes the current government consultation on the [White Paper on Online Harms](#).
- Consider how best to incentivise space for reporting on human rights issues linked to sport at a time when sports audiences are becoming more switched on to these themes. There need to be media platforms ready to welcome them (for example, on 18 March 2019 The Daily Telegraph launched a [women’s sport section](#) in the UK).
- Examine the best ways to encourage free press. While the UK government cannot interfere with other governments policies on free press, they can use relevant platforms to encourage a freer press, and encourage sports bodies to consider the implications on journalists when deciding where to stage their events.
- Consider carefully how export licences and export credit relating to technology that may be used in and around stadia to invade privacy and repress dissent, such as facial recognition technology. While this technology is not currently being used by broadcasters, the UK has an opportunity to play a role in the international governance of this space, dealing with social media companies such as Google, Facebook etc who also bid for sports rights.

For more detailed information on this topic, please see the session summary, available online [here](#).







# Discrimination in Sport

# 6

## 6.1 Summary – Gender

So far the APPG has looked mainly at the issue of gender discrimination. In the UK, [research from Women in Sport](#) found that only 56% of girls enjoyed taking part in school sport compared with 71% of boys and only 45% of girls saw the relevance of physical education to their lives, against 60% of boys. Another [report from EY](#) found that 94% of female executives in Fortune 500 companies played sport, making a very strong correlation between a woman's participation in sport and future career success.

## 6.2 Title IX

In the USA, The Education Amendments of 1972 included a clause, Title IX, which forbade discrimination on the basis of sex. The legislation specifically states that: "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

## 6.3 Key Issues

In addition to the frequently cited example of inequality in terms of remuneration, other inequalities exist in sport including:

- Unequal spending of taxpayer money – Wembley receives approximately £120 million in government funding, yet last year, they hosted 16 men's events for every one women's event.
- Lack of female representation on Boards – In the FA's 2016-2017 Handbook, it was reported that there are only two FA committees on which more than two women sit – the Women's Committee and the Judicial Committee (however, there are 23 members of the Judicial Committee and only 3 women). This means that women are either underrepresented, or not represented on critical committees such as on youth, football development and national game finance.
- Lack of sporting opportunities – The Equality Act states that schools have to provide equal resources for comparable (but not the same) activities – this means schools can decide that some sports are suitable for boys and others for girls.
- Resource disparity – Even in cases where there is a boys' and a girls' team, evidence was given that the fields used for the girls side might be of poorer quality, or provided at an inconvenient time making access to sport more difficult.
- Intersectionality – various forms of discrimination are often interrelated and women facing discrimination based on their gender, might also face barriers based on their ethnicity, social class, age, sexual orientation or other factors.

## 6.4 Summary – Racial discrimination

In sport, when looking at the area of “diversity and inclusion”, many organisations tend to think of ‘diversity’ as gender and ‘inclusion’ as disability, which is backed up by the UK Sports Governance code. The reality is that the issues are far more widespread than that and include:

- A knowledge gap on racial and broader diversity – The UK Sports Governance code sets a 30% target for women to be on Boards; however, this does not go far enough and in fact creates a “hierarchy of oppression” by saying that gender is more important than other diversity indicators, or is the only issue that needs to be considered when looking at “diversity and inclusion”
  - Because of the lack of accountability and understanding of the diversity picture as a whole, it misses the case for intersectionality. In other words, the whole picture needs to be considered;
- Lack of available data – While gender reporting is becoming more common, it is still difficult to aggregate data by gender. This becomes more difficult when trying to collect data on people of colour, disability, or sexuality.

## 6.5 A Code for Sports Governance

A [Code for Sports Governance](#) was developed by Sport England and UK Sport in recognition of the fact that over £1 billion was invested by the UK Government in sport between 2012 and 2016 and that with that investment must come greater accountability.

The Code is split into three tiers:

- Tier 1 – minimum requirements for funding. An investment is generally categorised as Tier 1 if it is granted on a one-off basis and is less than £250,000
- Tier 2 – these investments are generally for more money than Tier 1 but not as much as Tier 3 so the requirements are not as stringent
- Tier 3 – this is the top level of mandatory governance requirements. The highest level of governance is required because these investments are large (generally over £1 million) and funding is given over several years

Tier 3 requires the most stringent requirements, including on diversity. It mandates that:

- A target be placed on gender so that a minimum of 30% of the Board be one gender
- A strong commitment should be made towards achieving “greater diversity” including on Black, Asian and minority ethnic (BAME) representation.

One critique of the Code is that it places BAME diversity within the context of “greater diversity” which the Code itself outlines can also include age, religion, sexual orientation, marital status or socioeconomic background among others. This reinforces the notion that ethnic diversity is an “other” or “additional” category whereas gender diversity has targets to actively work towards.

## 6.6 Interim Findings

There is a need to mainstream intersectionality in sport. Diversity and inclusion are relatively well-known subjects in boardrooms and government departments across the country; however, as evidenced by this session, they are often placed in a box that sits outside the main management discussions, or are not looked at holistically.

### Gender

- Government, in collaboration with local authorities, to start tracking who is using what when it comes to public spaces and logging this information in a central database. MPs should also consider whether it is possible to look at this information in their local constituencies. They should ask questions such as:
  - Who is using the school fields? Is it equal? If not, why not?
  - How many girls' teams and boys' teams are playing?
  - How often do the girls' and boys' teams play? In other words, do the boys play in a regular league while the girls simply play in a one-off tournament?
  - Who uses parks and community centres? Are there facilities there for everyone to use?
  - Who uses stadiums? Both in terms of the teams playing in the stadiums and the fans attending?
- Consider undertaking similar initiatives as other sectors to encourage greater female participation on Boards in sport – ex. 30% women in FTSE 100 companies.
- Consider enacting legislation similar to Title IX which views sport as an educational opportunity for girls and key to their future career success.

### Knowledge gap on racial and broader diversity

- While government should continue to push for gender equality, government must also recognise that this is not the only form of diversity that can exist on Boards and should be careful not to reinforce this thinking with quotas and targets.
- The government should look at its guidance and codes calling for quotas and targets on gender and consider whether there are more meaningful metrics relating to, for example, race and disability. The government should incentivise that where reporting is separated by gender, that this be expanded to include other diversity metrics.
- The government should apply this reporting to their own practices and spending and consider whether public spaces are being fully utilised by all members of a community, including those from minority ethnic backgrounds.

For more detailed information on this topic, please see the session summary, available online [here](#).



# Appendix: Sources and Further Reading

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# Appendix: List of Contributors

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The below is a list of all people and organisations who submitted evidence (written and/or oral) to this APPG between April 2018 and April 2019.

- Amnesty International – May Romanos
- Ardea International
- BT plc – Moira Oliver
- BT plc – Fatou Jeng
- BT Sport – Simon Green
- BT Sport – Stephen Cook
- Building and Wood Workers International (BWI) – Jin Sook Lee
- Chartered Institute of Building – Emma Crates
- Discovery Eurosport – Ross Biggam
- Equal Playing Field – Maggie Murphy
- Ergon Associates – Steve Gibbons
- Human Rights Watch – Myrto Tilianaki
- Impactt – Rosey Hurst
- Independent researcher – Mustafa Qadri
- International Learning Lab on Public Procurement and Human Rights
- Journalist – Philippe Auclair
- Journalist – Simon Lansley
- Kick It Out – Roisin Wood
- Lewes Football Club – Karen Dobres
- Lewes Football Club – Shannon Moloney
- Marshalls Group – Elaine Mitchell-Hill
- Michelle Moore Consulting – Michelle Moore
- Northern Ireland Human Rights Commission
- Sky Sports – Duncan East
- Sky Sports – Charlotte Brierley
- SOAS – Dr. J Simon Rofe
- Supreme Committee for the Delivery of Qatar 2022
- The Guardian – Anna Kessel
- UNICEF UK



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